

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6312-CR-ROETTGER/Snow

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

JERMAINE WILLIAMS, et al  
Defendant.

**MOTION FOR EXTENSION OF TIME TO FILE MOTIONS**

The defendant, JERMAINE WILLIAMS, through counsel, respectfully requests this court for an indefinite extension to file motions, and in support thereof, the defendant states:

1. The defendant is charged by indictment with Conspiracy to Obstruct the Movement of Articles and Commodities by Robbery, in violation of 18 U.S.C. § 1951(a); Attempted Obstruction of the Movement of Articles and Commodities in Commerce by Robbery, in violation of 18 U.S.C. § 1951(a); and Using and Carrying a Firearm During and in Relation to a Crime of violence Resulting in Serious Bodily Injury, in violation of 18 U.S.C. 924(c)(1) and 2.

2. United States Magistrate Judge set the deadline for the defendants' pretrial motion for December 18, 2000.

3. Defendant Williams requests an indefinite extension to allow sufficient time to review the voluminous amount of discovery which the government has thus far provided, as well as the additional discovery which the government intends to provide in the future.

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4. Specifically, the government has thus far provided cassette tapes (without transcripts) of statements made by both defendants. Both statements lasted for several hours. The undersigned is currently preparing a motion to suppress the Defendant Williams' statement and respectfully requests an additional 14 days to file the Motion to Suppress statements made after the defendant's arrest for this offense.

5. The government has announced its intention introduce at trial a substantial amount of forensic evidence, including but not limited to fingerprints, blood analysis, results from DNA testing, fiber analysis and ballistic tests. The government will be unable to provide the results of the tests until after the testing is completed at the F.B.I. laboratories in Washington, D.C. Consequently, Defendant Williams moves for an indefinite extension to file motions relating to admissibility of the F.B.I. laboratory test results as well as pending test results from any other law enforcement agency.

6. The government has announced its intent to introduce evidence of prior bad acts pursuant to Fed. R. Evid. 404(b). Defendant Williams respectfully requests an additional 30 days to file a motion in limine to exclude the introduction of the 404(b) evidence.

7. Defendant Williams is considering filing a Motion to Sever pursuant to *Bruton v. United States*, 391 U.S.123, 88 S.Ct.1620 (1968). Defendant Williams respectfully requests an additional thirty days to file a Motion to Sever because the undersigned has yet to review the entire statement of co-defendant Espinueva.

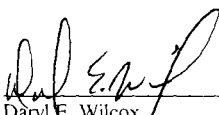
8. Pursuant to Local 88.9, the undersigned has contacted Assistant United States Attorney Thomas Lanigan and he does not object to relief sought by this motion.

WHEREFORE, Defendant Jermaine Williams respectfully requests that this Court enter an Order extending the time for filing defense pretrial motions which is consistent with the grounds set forth above.

Respectfully submitted,

KATHLEEN M. WILLIAMS  
FEDERAL PUBLIC DEFENDER

By:

  
Daryl E. Wilcox  
Assistant Federal Public Defender  
Attorney for Defendant  
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### CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was mailed this **21st** day of December, 2000 to Thomas Lannigan, Assistant United States Attorney at 500 East Broward Boulevard, Suite 700, Fort Lauderdale, Florida 33301 and Barry Wax, 301 South Biscayne Boulevard, Suite 1950, Miami, Florida 33131.

By:

  
Daryl E. Wilcox